

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

JOSEPH MARTIN AND LAURA MARTIN

PLAINTIFFS

VS.

CAUSE NO. 1:18-cv-00001-HSO-JCG

NATIONAL CREDIT SYSTEMS, INC.

DEFENDANT

UNOPPOSED MOTION FOR ADDITIONAL TIME

COMES NOW defendant, National Credit Systems, Inc., by and through one of its attorneys, and moves this honorable Court for an enlargement of time within which to serve a response to plaintiff's Motion for Partial Summary Judgment and in support thereof would show unto the Court as follows:

-1-

Lead counsel for defendant National Credit Systems, Inc., Charity A. Olson, has recently left the law firm of Brock & Scott, PLLC to accept a position with another law firm. National Credit Systems has elected to keep this matter with both lead and local counsel of record; however, additional time is needed to transition this matter to lead counsel's new law firm including completion of an updated conflict check, updates to counsel's contact information and transfer of all file materials pertaining to the subject case.

-2-

Receipt of all such materials is needed to prepare an adequate response to Plaintiff's motion and obtain client approval prior to filing.

-3-

This motion is not sought for delay or any other inappropriate purpose.

-4-

No party will be prejudiced by the sustaining of this motion and counsel for plaintiff has agreed to the requested extension of time.

-5-

The undersigned represents that counsel for plaintiff has been notified and states no opposition to this motion.

Wherefore defendant, National Credit Systems, Inc., respectfully requests that this Court enter an order for an enlargement of time until August 30, 2018 within which to respond to Plaintiff's motion.

Respectfully submitted, on this the 16th day of August, 2018.

NATIONAL CREDIT SYSTEMS, INC.,
Defendant

BY: /s/ Charity A. Olson

Charity A. Olson
(MI Bar No. P68295)
Admitted pro hac vice

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CERTIFICATE OF SERVICE

I, Charity A. Olson, one of the attorneys for the defendant, hereby certify that I have this day electronically filed the above and foregoing Unopposed Motion for Additional Time with the Clerk of the Court using the ECF system which sent notification of such filing to counsel who have electronically registered with the Court:

Michael T. Ramsey, Esquire
Sheehan Law Firm, PLLC
429 Porter Avenue
Ocean Springs, Mississippi 39564

This, the 16th day of August, 2018.

BY: /s/ Charity A. Olson
Charity A. Olson